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*Red Cliff Tribal Council*

Red Cliff Tribal Government  
Comments to the FCC on Section 706  
Broadband Speed and Deployment on Tribal Lands

To: Federal Communications Commission

The Red Cliff Band of Lake Superior Chippewa would like the following comments entered into the record regarding the Notice of Inquiry on Section 706 Broadband Speed and Deployment on Tribal Lands recorded as FCC filing number 18-238

Pertaining to broadband deployment on Tribal Lands:

For the purposes of considering broadband deployment, Tribal lands should be treated as separate of the census blocks in which they reside. The broadband distribution in surrounding census blocks do not represent the distribution on Tribal lands that they include. This results in Tribal lands showing as 'served' by broadband where they are not. The FCC should treat Tribal lands as their own organizational unit for determining broadband coverage.

Deployment measures on Tribal Lands must take into consideration the BIA process for Right-of-Way in the funding and timing matrix. Consideration should also be given to the higher costs associated with provisioning services in rural Tribal Lands where older infrastructure that has not been maintained by industry presents a barrier to deploying new technologies.

The Commission should track broadband deployment on Tribal Lands using mechanisms updated by the Tribal Governments directly rather than relying solely on reporting data from the telecommunications industry.

Eligible Telecommunications Carriers that receive FCC funds for deployment of services in a census block that contains Tribal Lands must be prohibited from passing over deployment on said Tribal Lands. Deployment of subsidized services must be deployed equally based on geography rather than economics or demographics. Currently, ETC's that receive FCC funds for deployment in rural areas consistently avoid deployment in Tribal Lands due to the increased costs and administration connected with these deployments. Actions such as this directly contradict the intent of FCC funds for high cost areas by bypassing the areas where deployment would cost the most and thus would benefit most from the subsidy.

These comments are respectfully submitted this 5th day of October, 2018.

Richard A. Peterson  
Chairman

*"The Hub of the Chippewa Nation"*